

Federal Defenders  
OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

**MEMO ENDORSED**

*Southern District of New York*  
Jennifer L. Brown  
Attorney-in-Charge

July 19, 2021

**VIA ECF**

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 7/20/2021

**Re: United States v. Robert Gonzalez**  
**20 Cr. 508 (VEC)**

Dear Judge Caproni,

I write to request that the Court adjourn the oral argument currently scheduled for Thursday, July 22, 2021 in the above-captioned case for approximately three weeks. Undersigned counsel will be leaving the country the morning of July 22, returning August 8 (I was hoping that my departure date might get moved back, but as of this morning, Britain still requires quarantine for vaccinated foreigners). As such, I ask the Court to adjourn the conference to any date after my return.

The government by Assistant United States Attorney Brandon Harper consents to this request.

Given the pending motions, we believe that time will be excluded under the Speedy Trial Act between now and the newly-selected date, and in the event it is not already excluded, we consent to the exclusion of time.

Thank you for your consideration.

Respectfully submitted,

/s/

Sylvie Levine  
Counsel for Mr. Gonzalez

Application GRANTED. Oral argument is adjourned to **August 10, 2021 at 2:30 p.m.** The hearing will be held in person in Courtroom 443. Members of the public may attend by dialing (888) 363-4749, using the access code 3121171 and the security code 0508. Any recording or retransmission of the hearing is prohibited.

In light of the logistical difficulties created by the COVID-19 pandemic, pursuant to 18 U.S.C. § 3161(h)(7)(A), the period of time between July 22, 2021 and August 10, 2021, is excluded under the Speedy Trial Act. The Court finds that the ends of justice served by accommodating those logistical difficulties outweigh the Defendant's and the public's interests in a speedy trial.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

7/20/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE